

**Richard J. Heffley**  
**Tallahassee, Florida 32312**

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OFFICE OF GENERAL  
COUNSEL

Mr. Jeff S. Jordan  
Federal Elections Commission  
Office of Legal Counsel  
Supervisory Attorney  
Complaints Examination & Legal Administration  
999 E Street, N.W.  
Washington, D.C. 20473

Dear Mr. Jordan:

I have received a complaint (MUR 6244) to me and my companies (Heffley & Associates and Strategic Direction.com) that is based on statements that are not at all true. I am not a lawyer but the complaint never says what law either me or my companies violated, so I can't respond to that. This site was clearly within my individual rights as stated in the Guides published by the FEC and your rules. For the record, here are factual inaccuracies in the letter.

I have received no compensation from the Charlie Crist for U.S. Senate campaign. I did create the website in question because, in my personal capacity, I do support him over Marco Rubio. I did not talk to him or anyone with his campaign about this website. The content of the website was all articles and links to articles that have appeared in places around Florida. There was no original content on the site except for several "flash poll" questions I wrote to try and get viewers involved in the site. Nowhere on the site was there a call for the election or defeat of Crist or Rubio or any other candidate.

I do not "share office space with the Crist campaign." I have offices on the first floor of a Tallahassee building, which I have leased since 2000. The Crist campaign is on the third floor of that building for the past few months. I have my own office equipment and entrance. I lease the space that I use. I run independent businesses and do not "share" with any campaign or political party, including specifically the Crist campaign or the Republican Party of Florida.

I did not create this site with any "involvement, consent, and/or knowledge of the campaign." My company has done and is doing work for the Republican Party of Florida, but that work, which includes making political telephone calls, has been exclusively about redistricting and for state races.

The complaint also asks about the identity of the source of funds for the website. The costs were minimal. Neither the Crist campaign nor the Republican Party of Florida paid any of the very minimal costs for my website. I did the work for the site on my own time and used freeware to create the site layout.

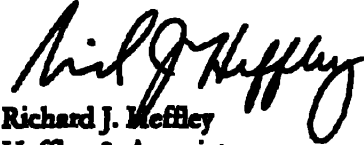
I recognize that everything having to do with campaigns is highly regulated from my service as a member of the Florida Elections Commissions and as the Assistant Secretary of State of Florida, which included oversight of the Florida Division of Elections.

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Because of that experience, I read the FEC Guide as well as your Federal Register section on your internet rulemaking and the definition of "public communications." I believe that this website complies fully with all the rules. I created this site as an unpaid blogger who coordinated with no one on the Crist campaign and created the content of the website on my own from previously published materials. I am exactly what Paul Ryan, head of the Campaign Legal Center in Washington, D.C., described in the Palm Beach Post article attached to the complaint: "a political junkie who wants to run a blog about an ongoing federal race."

I ask that you dismiss this complaint.

Sincerely,



Richard J. Heffley  
Heffley & Associates  
Strategic Direction.com

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